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February 26, 2025

Via ECF

Hon. Paul A. Engelmayer
 United States District Judge
 United States District Court
 Southern District of New York
 40 Foley Square, Room 1305
 New York, NY 10007

Re: *Niakate v. New York University Langone Health*
Case No.: 1:24-cv-09116 (PAE)
Request for Extension of Deadlines and Adjournment of Conference

Dear Judge Engelmayer:

We represent Defendant NYU Grossman School of Medicine, a division of New York University, s/h/a “New York University Langone Health,” (“NYUGSM”) in the above-referenced Action. We write jointly with Plaintiff’s counsel.

On February 13, 2025, this Action was referred to automatic mediation. (Dkt. No. 14.) Pursuant to the Second Amended Standing Administrative Order M10-468, the parties must exchange information/documents as specified in the Pilot Discovery Protocols for Counseled Employment Cases (“Discovery Protocols”) within 30 days of the Answered being filed, March 3, 2025. The mediator proposed a mediation date in March and a few in April. However, based on the parties’ availability, the mediation will occur sometime in April. The parties expect that a mediation date will be confirmed soon.

Pursuant to Rule 1(E) of Your Honor’s Individual Rules and Practices in Civil Cases, we write to respectfully request an extension of the Discovery Protocols deadline from March 3, 2025, to and including March 26, 2025.

Additionally, since the case was referred to mediation, the parties write to request an adjournment of the Initial Pretrial Conference (the “Conference”) pursuant to Rule 1(E), currently scheduled for March 31, 2025, at 2:30 PM, to a date after the mediation, which is convenient for the Court. This request also affects the parties’ deadline to file a joint Civil Case Management Plan and Scheduling Order (the “CMP”) due on March 17, 2025. We also respectfully request that this deadline be extended.

This is the parties’ first request to extend the Discovery Protocols deadline. This request is necessitated by the fact that the parties need more time to gather information/documents from their respective clients and exchange such information with each other. Prior to this Action being referred to mediation, Defendant requested an adjournment of the Conference. The request was

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granted, but the Court noted that there would not be further extensions. (Dkt. No. 13.) However, we note for the Court that this was before the Action was referred to mediation. Thus, in the interest of judicial economy, the parties believe it is appropriate for the Conference to be adjourned and for the deadline to submit the CMP to be extended in case the Action settles at mediation.

The parties thank the Court for its time and consideration.

Respectfully submitted,

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GRANTED. In light of the upcoming mediation, the Court hereby adjourns the initial pretrial conference to May 7, 2025, at 2 p.m. The parties' case management plan and joint letter should be submitted no later than May 5, 2025.

SO ORDERED.

PAUL A. ENGELMAYER

United States District Judge

Date: February 27, 2025